

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

In re:

FRANCHISE GROUP, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 24-12480 (LSS)

(Jointly Administered)

Re: D.I. 1454, 1596, 1605

Hearing Date: August 19, 2025 at 10:00 a.m. (ET)

Objection Deadline: July 28, 2025 at 4:00 p.m. (ET)

**NOTICE OF APPLICATION OF KIN LANDLORDS FOR ALLOWANCE
AND PAYMENT OF ADMINISTRATIVE EXPENSE CLAIMS PURSUANT
TO 11 U.S.C. §§ 365(d)(3) AND 503(b)(1)(A) ARISING FROM
NON-RESIDENTIAL REAL PROPERTY LEASES**

PLEASE TAKE NOTICE that, on July 7, 2025, Kin Properties Inc., as managing agent, and Steven Sandelman, Elyse Chodkowski (nee, Elyse Sandelman) and Tracy Brewer as Co-Trustees of the Alisan Trust ("Alisan Trust"), Steven Sandelman, Elyse Chodkowski (nee, Elyse

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of their U.S. federal tax identification numbers, to the extent applicable, are Franchise Group, Inc. (1876), Freedom VCM Holdings, LLC (1225), Freedom VCM Interco Holdings, Inc. (2436), Freedom Receivables II, LLC (4066), Freedom VCM Receivables, Inc. (0028), Freedom VCM Interco, Inc. (3661), Freedom VCM, Inc. (3091), Franchise Group New Holdco, LLC (0444), American Freight FFO, LLC (5743), Franchise Group Acquisition TM, LLC (3068), Franchise Group Intermediate Holdco, LLC (1587), Franchise Group Intermediate L, LLC (9486), Franchise Group Newco Intermediate AF, LLC (8288), American Freight Group, LLC (2066), American Freight Holdings, LLC (8271), American Freight, LLC (5940), American Freight Management Company, LLC (1215), Franchise Group Intermediate S, LLC (5408), Franchise Group Newco S, LLC (1814), American Freight Franchising, LLC (1353), Home & Appliance Outlet, LLC (n/a), American Freight Outlet Stores, LLC (9573), American Freight Franchisor, LLC (2123), Franchise Group Intermediate B, LLC (7836), Buddy's Newco, LLC (5404), Buddy's Franchising and Licensing LLC (9968), Franchise Group Intermediate V, LLC (5958), Franchise Group Newco V, LLC (9746), Franchise Group Intermediate BHF, LLC (8260); Franchise Group Newco BHF, LLC (4123); Valor Acquisition, LLC (3490), Vitamin Shoppe Industries LLC (3785), Vitamin Shoppe Global, LLC (1168), Vitamin Shoppe Mariner, LLC (6298), Vitamin Shoppe Procurement Services, LLC (8021), Vitamin Shoppe Franchising, LLC (8271), Vitamin Shoppe Florida, LLC (6590), Betancourt Sports Nutrition, LLC (0470), Franchise Group Intermediate PSP, LLC (5965), Franchise Group Newco PSP, LLC (2323), PSP Midco, LLC (6507), Pet Supplies "Plus", LLC (5852), PSP Group, LLC (5944), PSP Service Newco, LLC (6414), WNW Franchising, LLC (9398), WNW Stores, LLC (n/a), PSP Stores, LLC (9049), PSP Franchising, LLC (4978), PSP Subco, LLC (6489), PSP Distribution, LLC (5242), Franchise Group Intermediate SL, LLC (2695), Franchise Group Newco SL, LLC (7697), and Educate, Inc. (5722). The Debtors' headquarters is located at 109 Innovation Court, Suite J, Delaware, Ohio 43015.

Sandelman) and Tracy Brewer as Co-Trustees of the Diajeff Trust (“Diajeff Trust”), Stowsan Limited Partnership, and Esue LLC (collectively, the “Kin Landlords”), filed the *Application of Kin Landlords for Allowance and Payment of Administrative Expense Claims Pursuant to 11 U.S.C. §§ 365(d)(3) and 503(b)(1)(A) Arising from Non-Residential Real Property Leases* (the “Application”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that any objections or responses to the Application must be in writing, filed with the Clerk of the Bankruptcy Court, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801, and served upon the undersigned counsel on or before **July 28, 2025 at 4:00 p.m. (prevailing Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that a hearing to consider the Application will be held on **August 19, 2025 at 10:00 a.m. (ET)**, before the Honorable Laurie Selber Silverstein in the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 6th Floor, Wilmington, Delaware 19801 (the “Hearing”).

PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS TO THE APPLICATION ARE TIMELY FILED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.

Dated: July 7, 2025

BAYARD, P.A.

By: /s/ Ericka F. Johnson
Ericka F. Johnson (No. 5024)
600 N. King Street, Suite 400
Wilmington, Delaware 19801
Telephone: (302) 655-5000
Email: ejohnson@bayardlaw.com

and

TAYMAN LANE CHAVERRI LLP
Jeffrey Rhodes (*pro hac vice*)

2001 L Street, NW, Suite 500
Washington, DC 20036
Telephone: (202) 921-4080
Email: jrhodes@tlclawfirm.com

*Counsel for Kin Properties Inc., Alisan Trust,
Diajeff Trust, Stowsan Limited Partnership,
and Esue LLC*